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and
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Shasta Chapter
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June 11 1998

Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street
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Sacramento, CA 95814

Dear Sir:

On behalf of the Shasta Chapter of the California Native Plant Society, and the Lassen Forest Preservation Group, a forest issues citizens committee of the Yahi Group of the Sierra Club, I respectfully submit these comments regarding the proposals set forth in the CALFED EIS/EIR for management of water in the state of California.

I would like to incorporate by reference other comments submitted by the Friends of the River, the Sierra Club, the California Wilderness Coalition, The Nature Conservancy, the Sierra Nevada Protection Campaign, and the Klamath Forest Alliance.

The EIS/EIR for the plan will hereafter be referred to as the "CALFED plan."

We find that many of the CALFED plan proposals for restoration are commendable and we support them. Efforts to reintroduce anadromous fish runs in Sacramento tributaries, and improving habitat by removing dams, screening and closing diversions, improving fish ladders, etc. are worthwhile and cost-effective objectives which we whole-heartedly embrace. Similarly, we applaud efforts to improve Central Valley stream flows, restoration projects which will improve Delta riparian habitat by lowering stream temperatures, restoring stream meander (extremely important for native plant riparian forest ecosystems), and riparian plant restoration/revegetation planning efforts.

However, in spite of these positive proposals, we find that the plan contains numerous flaws which we cannot support. The most dangerous and detrimental, and costly of these proposals is the proposal to enlarge Shasta Dam.

We unequivocally oppose this proposal on the grounds that it is fiscally irresponsible, ecologically disastrous, unrealistic, scientifically unjustified and indefensible. The scientific community will oppose this vigorously and unequivocally. As a botanist who has worked extensively in the vicinity of the dam, and in these watersheds, I must tell

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you that such a proposal is unwise and irrational. Several species of rare plants occur in the area which would be inundated. One of these, Shasta snow-wreath, is of international importance to the scientific community. All of its nine known populations occur on federal National Forest land on the limestone geologic "island" within the vicinity of the confluence of the Pit River, the McCloud, and the Sacramento Rivers. This rare plant would likely be a federally listed endangered species if it occurred on private land, due to its extreme rarity and unique habitat characteristics. It is assumed by scientists, the public, and public land management agencies that this species will always be protected, since it occurs only within the boundaries of public land, on the Shasta-Trinity National Forest. The same is true for the rare Shasta salamander, another limestone endemic species found only in this vicinity.

The unique qualities of the limestone geologic island which occurs in the vicinity of these rivers' confluence, at Shasta Lake, have not been extensively studied. Much of it was irretrievably lost when the dam was built. Priceless cultural records were also lost, belonging to the Wintu and Pit River Native American people, now buried beneath the lake. A rare, disjunct population of the McNab cypress was also destroyed. These things we know, although it was not surveyed for rare species at the time (there was no Endangered Species Act back in the 40s). How many other rare species perished forever under the rising waters of Shasta Lake? Let us not repeat and compound this ecologically and culturally devastating boondoggle. The costs of the necessary environmental studies, potential litigation, costs of mitigation, etc. are far too excessive to even consider such a proposal--and when added to the cost of the actual construction, estimated at between 4.3 and 5.5 billion dollars, the project becomes totally unacceptable.

Similarly, we also oppose the proposal to construct dams on the main stem and the south forks of Cottonwood Creek. Cottonwood Creek is the Sacramento River's largest undammed tributary. It also lies on a major fault line which connects with Battle Creek in Shasta and Tehama Counties, and east to Lassen Peak, an area of intense and on-going volcanic and geothermal activity. There have been several significant earthquakes in the area of Lake California in recent years. This issue was not adequately addressed in the EIS.

Regarding the current status of endangered anadromous fish, the proposal is too risky and detrimental to the continued viability of these salmon and steelhead populations. The proposal would result in the loss of several thousand salmon and steelhead every year, and further degrade spawning habitat. This is unacceptable.

The Red Bank area of the south fork of Cottonwood Creek has not been sufficiently studied for its ecological and scientific values. I know it is extremely diverse botanically and geologically, and the loss of terrestrial habitats from inundation from the proposed dam emplacement would be irreparable. We oppose dam building on this tributary.

We also oppose the proposal to enlarge Berryess Reservoir. Putah Creek is known to support one of the last and best assemblages of native California aquatic species

remaining in the Sacramento Valley. The loss of at least two miles of Putah Creek, and inundation of up to 12 miles of streamflows, 35 miles of stream and over 300 acres of wetlands amounts to an unacceptable and unsustainable level of loss for these fragile and threatened ecosystems. We find that the basis premise for the CALFED proposals, to reverse the ecological decline of the Sacramento Bay-Delta ecosystem, is not well served by these proposals.

In addition, we are disappointed that there is no emphasis and no discussion concerning the need to plan and implement proposals which will encourage the wise use and conservation of water resources. There is a tremendous amount of wasted water in this state. Projects which educate and promote, and legislate, water conservation methods should be a significant part of this plan. We need to implement ways to use gray water for home owner and business landscaping irrigation needs. This one simple conservation change in the way we use water would have significant conservation impacts. An education campaign to teach consumers about the values of native plant, xeric-landscape gardening and landscape techniques would go far to get people freed from the addiction of the "green grass/mow/fertilize/herbicide" cycle which the typical average homeowner and business landscaper is hooked on, and which is extremely wasteful of water as well as being detrimental to the health of people and the environment. Rather than promote ideas which will lead to increased habitat destructions, more wasted water, and more usage, it is time for Californians to think in smaller, community minded ways which will help to heal the environment, save endangered species, and create health, wealth, and quality lifestyles for its residents. Some of the billions of dollars which are being considered for spending on dam building could be used to promote community gardens, where local residents grow much of their own fresh fruits and vegetables, using methods which conserve moisture and don't rely on the heavy use of poisonous herbicides and pesticides--such as are used in the Sacramento Valley by agribusiness, the main beneficiaries of these proposals.

Similarly, there has been no analysis of the trends for water usage which are changing and will continue to change. Currently the local beef market is at its lowest point in history. More and more citizens of this state have decided to eat less beef, and this trend is not likely to reverse itself, as citizens learn of the effects of factory farming and meat processing on their health and the environment. It is likely that there will be a significant down turn in the need for irrigated pasture in the future, as beef ranching will become less and less profitable. There is not even a way to measure the actual per capita usage of water in this document. It is hard to imagine in this day and age that millions of dollars will have been spent to prepare and analyze this management plan for a fundamental resource like water, which will cost billions of dollars to implement if approved--yet the per capita use of this resource is unknown. This fundamental flaw occurs precisely because the issue of conservation has not been a primary focus. We believe that a whole new way of re-thinking water use must be the starting point for a plan to restore this ecosystem. This re-thinking must begin with an understanding that big agribusiness and pork-barrel public works projects are the problem, not the solution, and this has always

been the case. We must begin to think differently, and that means thinking on a community level--community by community, neighborhood by neighborhood.

Finally, I am extremely concerned about the rhetoric which has surfaced relative to wildfire management, timber harvest, and upper watershed restoration. As a botanist, I differ in the strongest terms to quasi-scientific claims that our upper watershed forests will benefit from increased timber harvest--that by cutting more trees, there will be more water available in the streams. This is ludicrous and preposterous from a scientific standpoint. If forested streamsides were choked with alder and willow thickets, there would be a significant increase in water flow if these areas were cut back. Areas that meet that description, however, are extremely rare. Also, these species are necessary to shade, to hold the soil in riparian banks from erosion, and as habitat for rare species like the willow flycatcher. More typically, however, apologists for the timber industry use this idea as an excuse to cut large conifers which grow to large size in riparian corridors. My objections to this notion are summarized below:

1) Riparian vegetation moderates the microclimate by absorbing water through root systems during the day, and breathing (transpiration) water into the atmosphere during the night. Over a large land mass, vegetation acts as a water "sink", holding water in the ecosystem and humidifying the air. Without this large scale humidification, there could be no precipitation. "Desertification" results when vegetation is completely removed and cloud formation does not occur, resulting in reduced rainfall and drought--which in turn results in less vegetation being able to grow (an endless cycle).

2) Riparian vegetation canopy moderates the flow of precipitation to the substrate--i.e., it softens the pressure of rain and snow on the ground. This helps to prevent erosion, and creates a nurturing environment for the growth of understory species and habitat for wildlife. It also helps to moderate peak flow events by slowing down the mass movement of water.

3) The roots of riparian vegetation hold the soil in place so that it doesn't get washed downstream.

4) Increased logging has been shown to actually *increase* the threat, intensity, and duration of wildfires. Typically, the volume of "slash", limbs, needles, etc. left on the floor of the forest after a typical logging operation greatly increases the flammability of the stand. Remaining trees are left exposed to the drying effects of our California summers; they are frequently injured from the logging operation, and will suffer increased mortality from sunburn stress and the shock of going from a shady, cool, habitat one day, to harsh exposure to wind and sun the next, after a logging operation. In many cut stands, the remaining trees cannot stand up to a typical winter in the mountains, because the support and climatic mediation of the big trees which they grew with has been removed. These young, spindly trees are prone to "windthrow", breaking off and falling down after a winter storm. These dead trees further contribute to the aridity and fire hazard of the stand.

None of these concepts are new and have been well understood since the post-Dust Bowl/Depression era and the investigations into erosion and water regimes during the 40s. If scientific research does not prevail, then surely common sense should inform

anyone that healthy riparian ecosystems are vital to abundant pure water flows. Removing the conifer forests that moderate peak flows in the headwaters of these streams is an insane idea and one which should be discredited with vigor. Similarly, the notion that commercial cutting of forest ecosystems will prevent wildfire, should be scrutinized and identified as a propaganda smoke screen invented by the timber industry to provide the industry with more taxpayer subsidized timber.

The only acceptable alternative to addressing the need to ameliorate the effects of 100 years of fire suppression is to formulate a plan and budget which would put a labor force of local people to work in the woods, cutting and thinning by individual selection, in high risk areas, through hand labor only with no commercial objective to cut timber. All the thinnings should be hand piled and burned in the fall, or cut and piled in accessible areas for free fire wood for local forest communities. Several years of this focused approach would have tremendously beneficial effects in our woods. Crews of CCC, labor crews from the prisons, and local EDD utilizing welfare-to-work programs could create positive work programs for our under-utilized labor force.

Over-all, the proposals set in this plan fail because they do not address the true nature of the problem, which is fundamentally cultural. Cultural patterns of usage, trends, the need to find meaningful work and connect with nature for our under-utilized (and marginalized) labor force, the need to incorporate conservation into our daily lives on the societal level--these issues are not addressed. Failure to address them means that any alternative will be ultimately only a Band-Aid or temporary fix. The American public has overwhelmingly stated in poll after poll that the environment matters more than the growth of business and the pursuit of "progress." It is the duty of public servants to give the public what it wants. I believe this document fails to adequately protect endangered species or to find a long-term, scientifically and socially defensible solution.

In summary, we oppose the building of any new dams, or the enlargement of existing dams. We wish to encourage the promotion of alternative water usage lifestyles through education and regulation, promoting conservation and reclamation, and sustainable agriculture. We encourage and support revegetation and restoration of riparian and rivarine ecosystems, and recovery efforts for rare and endangered species. We also encourage and support the formulation of an alternative which would utilize local labor to do hand thinning and prescribed burning, without a commercial objective, in upper watershed forests, to reduce the risk of wildfires which has occurred from an abnormal build-up of flammable material and intensive fire suppression policy.

Thank you for the opportunity to comment on the CALFED plan. Please send me any additional documentation or decision notices which result from this proposal.

Respectfully,

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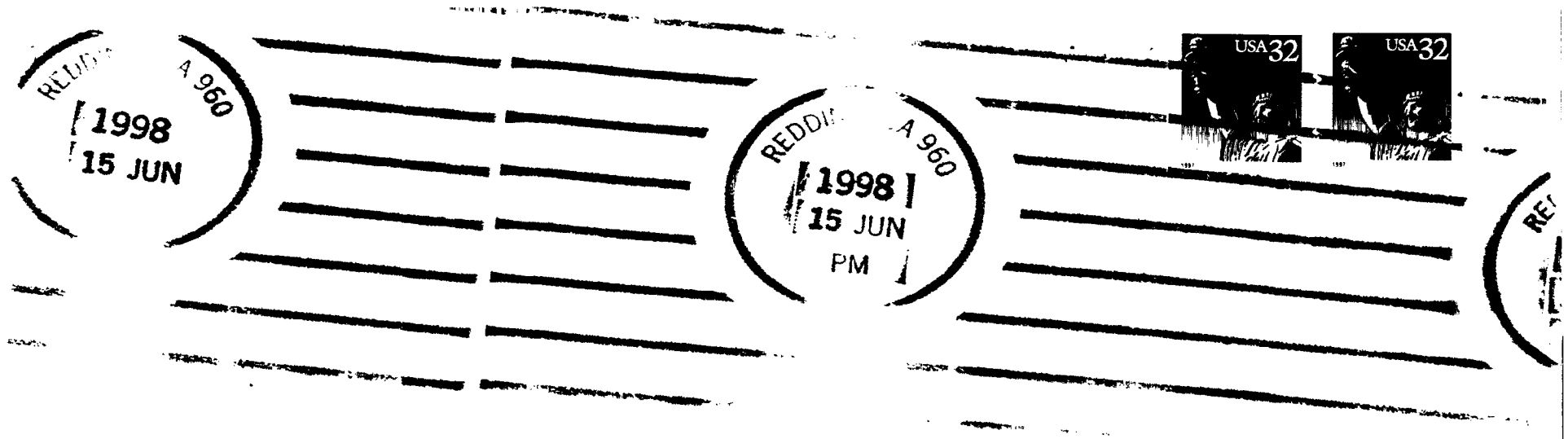

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